

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

GUARDIAN OPERATIONS LLC, a
Washington limited liability company,

Plaintiff-
Counterdefendant,

vs.

TRISTATE ROOFING INC., a Washington
corporation,

Defendant-
Counterclaimant.

CIVIL ACTION No. 2:24-cv-00430-JHC

STIPULATED MOTION FOR
EXTENSION OF TIME OF ALL
DEADLINES

Plaintiff and Counterdefendant Guardian Operations LLC, (“Guardian”) and Defendant Counterclaimant Tristate Roofing, Inc. (“Tristate”), by and through its undersigned attorneys, respectfully request that the Court extend all deadlines in this action as follows:

1. The parties have agreed in principle to a settlement and, in order to provide the parties with additional time to finalize the settlement, the parties agree that the time for all deadlines in this case should be extended by at least 30 days.

2. Good Cause exists for this extension as the parties are negotiating in good faith to finalize a settlement for this dispute and require additional time to come to an agreement. Having

1 additional time to finalize the settlement agreement will be beneficial to finalizing an amicable
2 resolution to this case without expending further judicial resources.

3 3. The parties respectfully request that the Court enter the below Order extending the
4 existing deadlines as follows:

- 5 a. **August 16, 2024:** Guardian's opposition deadline to Tristate's Motion to Strike
6 Counterclaim Defendant's Affirmative Defenses ("Motion to Strike") (Dkt. 13)
7 (previously July 17, 2024);
- 8 b. **August 21, 2024:** Noting date for Motion to Strike and deadline for Tristate's
9 reply to Guardian's opposition to Motion to Strike (previously July 22, 2024);
- 10 c. **August 23, 2024:** Tristate's opposition deadline to Guardian's Motion for
11 Judgment on the Pleadings ("Motion for Judgment on the Pleadings") (Dkt. 14)
12 (previously July 24, 2024);
- 13 d. **August 26, 2024:** Deadline for FRCP 26(f) Conference (previously July 25, 2024);
- 14 e. **August 30, 2024:** Noting date for Motion for Judgment on the Pleadings and
15 deadline for Guardian's reply to Tristate's opposition to Motion for Judgment on
16 the Pleadings (previously July 31, 2024);
- 17 f. **September 9, 2024:** Initial Disclosures Pursuant to FRCP 26(a)(1) (previously
18 August 8, 2024);
- 19 g. **September 16, 2024:** Combined Joint Status Report and Discovery Plan as
20 Required by FRCP 26(f) and Local Civil Rule 26(f) (previously August 15, 2024).

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1 DATED this 11th day of July, 2024

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20 *Counsel for Defendant Tristate Roofing Inc.*

ORDER

Based on the foregoing stipulation of the parties and good cause shown, IT IS HEREBY ORDERED that the deadlines in this action are extended as follows:

- August 16, 2024: Guardian's opposition deadline to Tristate's Motion to Strike Counterclaim Defendant's Affirmative Defenses ("Motion to Strike") (Dkt. 13);
- August 21, 2024: Noting date for Motion to Strike and deadline for Tristate's reply to Guardian's opposition to Motion to Strike;
- August 23, 2024: Tristate's opposition deadline to Guardian's Motion for Judgment on the Pleadings ("Motion for Judgment on the Pleadings") (Dkt. 14);
- August 26, 2024: Deadline for FRCP 26(f) Conference;
- August 30, 2024: Noting date for Motion for Judgment on the Pleadings and deadline for Guardian's reply to Tristate's opposition to Motion for Judgment on the Pleadings;
- September 9, 2024: Initial Disclosures Pursuant to FRCP 26(a)(1);
- September 16, 2024: Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f).
- The Court DIRECTS the Clerk to re-note the Motion to Strike, Dkt. # 13, for August 21, 2024, and the Motion for Judgment on the Pleadings, Dkt. # 14, for August 30, 2024.

DATED this 12th day of July, 2024.



John H. Chun
UNITED STATES DISTRICT JUDGE